

WILLIAM SHERLACH, <i>et al.</i> ,)	
)	JUDICIAL DISTRICT
Plaintiffs,)	
)	OF FAIRFIELD
vs.)	
)	AT BRIDGEPORT, CONNECTICUT
)	
ALEX JONES, <i>et al.</i> ,)	CASE NO: FBT-CV18-6076475-S
)	
Defendants.)	

PART II OF REPLY ON HALBIG’S MOTION TO DISMISS

Defendant Wolfgang Halbig (“Halbig”), pro se, hereby submits Part II of his reply to “Plaintiffs’ Objection to Defendant Halbig’s Motion to Dismiss” (“Plaintiffs’ Objection”) dated December 4, 2018.

This Part II provides reliable documents (“the Exhibits”), along with a citation to the rule in the Connecticut Code of Evidence establishing the admissibility of each, as authorized by Connecticut Practice Book Sec. 10-30, which says affidavits may be submitted in support of a motion to dismiss for lack of personal and subject matter jurisdiction. Legal argument responsive to Plaintiffs’ Objection is in Part I, submitted together with this Part II.

Hard copies of the Exhibits, with images in black and white (save Exhibit 55, which only exists online), are filed with the court only in connection with the Lafferty case (FBT-CV-18-6076475-S), but incorporated by reference in this pleading. Replicas of all Exhibits (in color) are available at this link¹ and individual exhibits are linked to where referenced in the text. Exhibit labels are on the bottom of the first page of each exhibit. All documents at the link in n.

¹ <https://app.box.com/s/uhfyhqtgou4hckm59cbpai11lwyk9ezm> .

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1 are incorporated by reference and provision of this link constitutes service on the parties. The Exhibits will be used to support other filings, as well, if this case goes further. In contrast, Plaintiffs have provided *no* reliable documents or facts whatsoever in support of their Objection, even while admitting that the case law puts the burden of proving personal jurisdiction direction squarely on them. Instead, they refer only to the stream of insults and accusations in their complaint. These are not facts.

A. *Background.* Halbig is a retired national school safety consultant, former U.S. Customs official, former Florida State Patrol trooper—and concerned citizen. He is an expert on school safety and has given sworn testimony as such in cases around the country. While he does not need to establish expert credentials for purposes of this reply, since most of the documents he submits are self-authenticating and admissible as the official statements of governmental agencies, his resume is attached.

Due to inconsistencies in reports of the so-called Sandy Hook shooting on Dec. 14, 2012 (the “Sandy Hook Event” or “the Event,” henceforth), as well as bizarre and unlawful conduct by law enforcement and others, Halbig has investigated the matter himself by means of Freedom of Information requests to local, state, and federal agencies. The documents he requested were almost never produced, forcing Halbig to hire an attorney to prosecute FOI appeals. He traveled to Connecticut 14 times specifically for these FOI hearings, which took place from 2014 to 2016.² Halbig has pored over the 7,000-page report produced by the Connecticut State Police, a report redacted to the point of unintelligibility, lacking even a table

² Halbig came to the state another eight or so times to monitor hearings in a court case in which another Sandy Hook skeptic was wrongfully prosecuted for exercising his First Amendment rights. This person is Jonathan Reich, a New York resident who had the audacity to telephone the Connecticut medical examiner, Wayne Carver, to ask him about autopsies of the putative Sandy Hook victims. Reich was extradited wrongfully from New York to Connecticut on a misdemeanor charge of harassment, *and imprisoned at Riker’s Island.*

of contents or an index in an obvious effort to thwart researchers.

What Halbig now produces to the court is a distillate of what his efforts have uncovered. These materials establish without question that the Sandy Hook event was staged and planned months, if not years, before Dec. 14, 2012. Where *no* records were produced, as was usually the case, the absence is an admission that such documentation either was never created, in violation of laws requiring it to be created, or—as Halbig suspects with the Trooper 1 radio communications—the record does not support the official narrative about Sandy Hook, and was withheld for that very reason.

B. Evidence establishing that Sandy Hook Elementary was not an operating school on Dec. 14, 2012, and the Sandy Hook “shooting” was a staged production.

1. The inclusion of Chalk Hill in Monroe on Newtown Public Schools’ 471 application indicates use of this school by SHES students was planned at least nine months before the Sandy Hook Event.

It was widely reported³ that, the weekend after the Sandy Hook Event--Dec. 14-17, 2012--the Newtown Board of Education made a hurried agreement with the Town of Monroe, Connecticut, to move the traumatized Sandy Hook Elementary School (SHES) students to a vacant middle school in Monroe known as Chalk Hill. The move enabled SHES students to resume school on Jan. 3, 2013, without interruption. Every item within SHES—pencils, desks, backpacks—was reportedly transported to Chalk Hill and placed in the same position it had been in at SHES. Chalk Hill was even renamed “Sandy Hook Elementary.”

This “move” by SHES students to the vacant Chalk Hill School had, in fact, been planned

³*E.g.*, <https://www.monroecourier.com/1176/monroes-chalk-hill-school-will-be-used-to-house-sandy-hook-elementary-students/>

the 2012-13 school year (Exhibit 5). E-rate discounts are reimbursements by the FCC for the charges paid for telecommunications services by school districts. They are applied for on FCC Form 471 and calculated using the same percentage of free lunches the district provides to low-income students.

Newtown Public Schools' 471 application for 2012-13 included Chalk Hill Middle School in its list of Newtown schools. Exhibit 5 (available for downloading from the USAC website http://www.slforms.universalservice.org/Form471Expert/DisplayExt471_StartSearch.aspx)

However, Chalk Hill is not in the Newtown School District. It is at 375 Fan Hill Road within the Town of Monroe. On July 1, 2011, after a "demolition study," Chalk Hill had been closed by Monroe Public Schools (Exhibits 2 and 3⁴). On that date, Monroe Public Schools turned Chalk Hill over to the Town of Monroe (Exhibit 3, email from MPS superintendent James Agostine).

In Newtown Board of Education's 471 application, sent certified to the FCC on March 13, 2012 with a contract start date of July 1, 2012, the number of students and percentage of free lunches it claimed for Chalk Hill are identical to those it claimed for a school within the Newtown School District, Sandy Hook Elementary School ("Sandy Hook School"), located at 12 Dickinson Drive in Newtown. Chalk Hill not only was not in Newtown, it was closed and provided no internet service to any students. This was thus a fraudulent application by Newtown Public Schools.

Exhibit 7 is the minutes of a Monroe Town Council meeting on Sept. 10, 2012, which refer to the "benefit to the town and with our finance department" of an undisclosed plan relating

⁴ Exhibit 2 contains only the executive summary of the report.

refer to the “benefit to the town and with our finance department” of an undisclosed plan relating to Chalk Hill School⁵ and warn that the town could be in “a very dark place” if the new position of deputy finance director is not immediately created (in the middle of the budget cycle) and filled with one Heidi Meade. First Selectman Stephen Vavrek stated he did not know why Chalk Hill had been put on the agenda. It is apparent from Exhibit 4 that he had ducked citizens’ questions about plans for the school for some time. Chalk Hill was turned over by MPS to the Town of Monroe after the study done in December 2010 recommending Chalk Hill be either mothballed or demolished.

Newtown’s Form 471 (Exhibit 5) further shows that Newtown claimed reimbursement for *both* Sandy Hook School and Chalk Hill for the 2012-13 school year, using the same number of students (521) and same proportion of students receiving free lunches (4.223%) for each school. This was thus a claim for a double reimbursement, at a time when Newtown Board of Education had no colorable jurisdiction over Chalk Hill and Chalk Hill was not an operating school.

There is no record of any public act taken by the Town of Monroe designating any use for Chalk Hill between July 1, 2011, and Dec. 20, 2012. See Exhibit 4 (a citizen’s letter to the editor of the local newspaper, *Monroe Patch*) and the *Patch* article about Monroe Planning and Zoning Commission action taken on Dec. 20, 2012⁶). Monroe’s Parks and Recreation Department had made use of Chalk Hill for offices during this period.

⁵ The minutes are at:

[http://www.monroect.org/filestorage/343/77/1300/2186/8333/September_10,_2012_TC_Regular_Meeting_FINAL_AMENDED_Minutes_\(Session_2012-15\).pdf](http://www.monroect.org/filestorage/343/77/1300/2186/8333/September_10,_2012_TC_Regular_Meeting_FINAL_AMENDED_Minutes_(Session_2012-15).pdf)

⁶ <https://patch.com/connecticut/monroe/p-z-approves-municipal-referral-for-chalk-hill>

The 471 claim by Newtown Public Schools for Chalk Hill, with a contract start date of July 1, 2012, establishes that the so-called Sandy Hook shooting which reportedly took place Dec. 14, 2012, was planned as a pretext for obtaining the ultimately \$50 million in public money NPS was awarded for the demolition and reconstruction of Sandy Hook School (as well as to serve a host of other agendas, all of which have involved payouts of millions of dollars more of taxpayers' money, as well as the fraudulent solicitation of private funds, which will be set forth in future pleadings if this case goes further).

Admissibility of Exhibits 1, 2, 3, 5, and 6 is established by Connecticut Code of Evidence ("Code") Section 8-3(7), as the statements of public offices or agencies made by persons under a duty to make such statements in the course of their official duties, with personal knowledge of the matters contained in the statement. They are self-authenticating per Code Section 9-1(b). Exhibits 4 and 7, the newspaper articles, are hearsay, but provided for informational purposes.

2. Food deliveries for Sandy Hook Elementary were going to Chalk Hill in 2012. Food delivery records provided to Halbig by various sources show that food was being delivered to "Sandy Hook Elementary at 375 Fan Hill Road, Monroe, CT" between April 26, 2012, and Jan. 2, 2013. As discussed, the address of Sandy Hook School until Jan. 3, 2013, was 12 Dickinson Drive, Newtown, CT; and Chalk Hill School, the address of which is 375 Fan Hill Drive, Monroe, CT, was closed and served no students between July 1, 2011, and Jan. 2, 2013. According to the official narrative Chalk Hill was not transformed into "Sandy Hook Elementary"--and no students were there--until Jan. 3, 2013. The delivery of food to "Sandy Hook Elementary at 375 Fan Hill Drive" in Monroe between April 2012 and Jan. 2, 2013 establishes that the narrative of students being at an operational school at 12 Dickinson Drive in

Newtown during that period is false.

Exhibit 8 is the screen shot from a food truck driver's delivery manifest showing that delivery on April 26, 2012, to Sandy Hook (“@ Chalk Hill Middle School”) was made at 375 Fan Hill Road, Monroe. The phone number (203-426-7659) belongs to Sandy Hook School (although it comes up today as assigned to Town of Newtown), and Lorna Szalay was Sandy Hook School's kitchen manager (although her actual employer is believed to be Compass Group).⁷ So she was at Chalk Hill, too.

Exhibit 9 is emails from Kelley Montin of Dean Foods, which provides dairy products to schools nationwide, along with a spreadsheet showing invoice numbers between Sept. 1 and Dec. 15, 2012. The spreadsheet says “Sandy Hook Elementary School Invoices for Chalk Hill Middle School, 375 Fan Hill Road, Monroe, CT.” (A larger copy of the spreadsheet is provided on the second page of Exhibit 9.) Ms. Montin's email verifies that the deliveries were made to Sandy Hook Elementary School at 375 Fan Hill Road in Monroe, as well as that the bills were sent not to the Newtown School District administrative offices, but to a Julie Kulikowski at Newtown High School, 12 Berkshire Road in Newtown, which could reveal an effort to keep records of the address change and payments out of school district offices. (Staff records at Newtown High School list a *Jacqui* Kulikowski, whose position is “Secretary, Chartwells.” Chartwells, Dean Foods, and Sysco are intertwined with Compass Group, which was successfully prosecuted in 2012 under New York's False Claims Act for overcharging for school lunch programs, resulting

⁷ <https://www.nytimes.com/2013/05/11/nyregion/panel-recommends-building-new-school-at-site-of-sandy-hook-elementary.html>

in an \$18 million settlement with the New York Attorney General.⁸) These screenshots, spreadsheets, and emails (Exhibits 8 and 9), are admissible as business records under Code Sec 8-4.

Augmenting both the 471 applications and the food delivery records is the historical Google Earth photo of Sandy Hook Elementary School *at 375 Fan Hill Drive, Monroe* taken March 29, 2012, Exhibit 55. It was provided anonymously to Halbig and is admissible under the residual exception to the hearsay rule, Code Sec. 8-9, since anyone can pull up the same image themselves. It shows Google Earth was programmed to produce the image of Sandy Hook School when the address 375 Fan Hill Drive, Monroe, CT, was input, as of March 29, 2012.

The move of students from Sandy Hook School to Chalk Hill was not prompted by the “Sandy Hook Shooting” of Dec. 14, 2012, therefore. It occurred likely many months, if not years, earlier. (Halbig requested records only from the period Sept. 1 to Dec. 14, 2012.)

3. Newtown Police Dept. and Connecticut State Patrol manufactured fake records to document their activities and the crime scene during the “Sandy Hook Shooting” on Dec. 14, 2012.

a. *Faked dash cam videos and photographs.* Halbig requested under the Connecticut FOI law, from the Newtown Police Department (NPD) and Connecticut State Police (CSP), the dash cam videos from all patrol cars responding to the Sandy Hook Event on Dec. 14, 2012.⁹ He has never been provided any *dash cam* videos. Dash cam videos must show the hood of the car. (Halbig’s affidavit, attached) Halbig was, instead, provided—after pursuing an appeal to the FOI commission of NPD’s denials of his requests--videos apparently

⁸ <https://ag.ny.gov/press-release/ag-schneiderman-announces-18-million-settlement-compass-group-usa-overcharging-nys-7>

⁹ These videos will be provided to the court on request.

shot out of the window of a car, since they do not show the hood.

Screenshots Halbig took from these videos are Exhibits 10-12, 14, and 15. Exhibits 10-12 are views of three different vehicles seen from the putative front window of a car identified as being driven by Officer Chapman, Car 13, at the same time: all three photos bear the same time stamp, 9:21:43 a.m. on 12/14/12. Thus, they were faked. In fact, as Exhibit 13 shows, Officer *Seabrook* was assigned to Car 13 on 12/14/12. Chapman was assigned to Car 18.¹⁰

Exhibits 14-A, -B, and -C show more anomalies. Both photos on 14-A bear a stamp saying they were taken on Dec. 14, 2012, one at 02:28:40 and the other at 02:28:46. They are, again, totally different views, one in daylight and the other at night. In Exhibit 14-B, the date and time stamps say 12/14/12 at 8:59:35, but again we see two different views.¹¹ These were supposedly from Car 13, with Chapman, but, again, the officers' work schedule, Exhibit 13, establishes that Chapman was not assigned to Car 13. In Exhibit 14-C, which says it was taken 12/15/12 at 9:43:31, the ID again says Car 13 Chapman. Not only was Car 13 assigned to Seabrook on that day, Chapman is not even on the roster.

Exhibit 15 shows an officer crouching by a vehicle, poised to shoot a gun. It is not from a dash cam, since no hood is seen; and it says "Hayes, Car 18." Chapman, not Hayes, was assigned Car 18 on 12/14/12 (see Exhibit 13). The time stamp on this photo says 9:39:52. But the transcript of Newtown Police radio transmissions on 12/14/12 (also on Exhibit 15) at 10:24:12 has Officer Hayes reporting to Officer Kullgren, "I am in town with my gear if you need another set of hands." According to the photos, Hayes had already been on the scene at

¹⁰ The daily work schedules attached as Exhibits 13 and 16 were authenticated under oath by Chief Kehoe of the Newtown Police Department at Halbig's FOI hearing in June 2015.

¹¹ The two photos below Exhibit 14-B are duplicates of Exhibit 11.

dash cam videos from both 12/13/12 and 12/14/12 of 32 CSP officers, identifying them by name and badge number. Exhibit 38. Only three videos were provided due to “technical problems,” and these show only driving on the Interstate. There are no videos in existence showing any children being evacuated from the school.

b. Fake work schedule from Dec. 14, 2012. The work schedule from 12/14/12 (Exhibit 13) is in a different format from the work schedules for 12/15/12, 12/13/12, 12/10/12, 12/9/12, and 11/9/12, provided to Halbig (Exhibit 16). *See* n. 10, above. It also shows no Tasers assigned to anyone on 12/14/12, yet Tasers were routinely assigned on other days.

c. Faked photos of Roig’s classroom door windows and handles. Kaitlyn Roig has been lauded as a hero for supposedly taking 15 children into a bathroom which measured 4’ x 3’ inside her classroom, and locking the door against the shooter on Dec. 14, 2012.¹² While cramming that many people into such a small space (with toilet and sink already in it) is incredible in and of itself, Exhibit 17, three photos from the CSP report¹³, shows in the top photo a circular window in the door of Roig’s classroom, Classroom 12. In the photo on the right hand side, the window in the door is rectangular. So at least one of these photos is fake. Also, note that the door handle locks from the outside with a key: there is no ability to lock it from the inside. Thus, Roig’s story is false.

¹² https://www.washingtonpost.com/politics/police-file-on-newtown-yields-chilling-portrait-of-shooter-and-more-details-of-rampage/2013/12/27/2d09a548-6f4b-11e3-b405-7e360f7e9fd2_story.html?utm_term=.bbd1b6337b60

¹³ This 7,000-page report was produced nine months after the Sandy Hook event. It is at: <https://cspsandyhookreport.ct.gov/>.

3. Other material evidence that Sandy Hook School was closed well before 12/14/12.

a. *Bulletin boards with old information—or nothing--on them.* The top photo in Exhibit 17, supposedly taken on Dec. 14, 2012, shows a bulletin board in Kaitlyn Roig's classroom bearing a sign "March into Reading." "March into Reading" is a national campaign which takes place every March. It is contrary to standard educational practice to neglect to update bulletin boards, since a precept of good teaching is to engage students as soon as they walk into the classroom. See Wong, H. *The First Days of School*. Yet empty or outdated bulletin boards are all that are seen in photos of Sandy Hook School. This one has torn scraps of paper on it, and no point: items were obviously removed from it in haste. Moreover, it was Christmas, and no holiday decorations are seen.

b. *Building in disrepair.* Photos from the CSP report show a school which was unusable for students, with dangerous conditions such as broken concrete, mold and rot, water stains, rust, dirt, broken floor tiles, broken gates, piles of junk in hallways and closets, a metal rod sticking out from a staircase, and much more.¹⁴ Halbig's attorney had subpoenaed the custodian, Kevin Anzellotti, for his FOI hearing, in order to ask him about the condition of the building, but Anzellotti was improperly instructed by NPD's attorney Monte Frank to ignore the subpoena. Halbig got no relief from the Commission for this grievous misconduct.

¹⁴ See: <https://imgur.com/a/sBfhz#HnhZkk9>

c. *Demolition contractors required to sign confidentiality agreements.*

The contractors who demolished Sandy Hook Elementary were required to sign confidentiality agreements, as was widely reported in the press. The contractors would know the school had been in use, as well as if there were blood inside¹⁵, so are prohibited from talking.

4. Substantial evidence that the event was staged and no one died.

a. *Paramedics never entered the school.* Exhibit 48 is the statement of Emergency Medical Technician Captain Karin Halstead taken by investigators, which appears in the CSP report, that neither she nor any of her crew--the Search and Rescue Team--went inside the Sandy Hook School on Dec. 14, 2012. This means not only that no rescue was attempted, but that no medical professional ever declared anyone inside the school dead. (While she does say she treated a patient with a gunshot wound outside the school, that person's name is redacted and Capt. Halstead's statement was not made under oath.)

Karin Halstead's mother Barbara Halstead was, in fact, the school secretary who made the first 911 call. She reportedly hid inside a closet for 3½ hours. Captain Halstead's admission that no EMT's went inside means she did not bother to look for her own mother.¹⁶

¹⁵E.g.: <https://nypost.com/2013/10/15/sandy-hook-demolition-team-sworn-to-secrecy/>

¹⁶ Three other Halstead family members had key roles in the Sandy Hook event: Karin's father William Halstead, marshal of Sandy Hook Volunteer Fire & Rescue, who has been with that organization since 1978; Karin's husband John Jeltima, a firefighter; and William Halstead's new wife Debbie Aurelia, the town clerk of Newtown, who pushed for legislation closing death certificates of minors to public inspection. Another Halstead, William, Jr., who is an emergency management analyst at Yale, makes a likely sixth participant from this family.

b. No claims for workers' compensation or property damages filed; insurance documents withheld.

On Sept. 20, 2018, Halbig made a request under the Connecticut FOI laws to Donna Hamzy of Connecticut Interlocal Risk Management Agency (CIRMA), the provider of workers' compensation insurance to Newtown Public Schools, for claims for injuries incurred in, and death benefits paid as a result of, the Sandy Hook event (Exhibit 19). He has received no response. The lack of documentation indicates *no* staff deaths or injuries occurred, contrary to published reports that six adult employees died and one injured survivor was sent to hospital.

On April 8, 2016, Halbig asked Ronald Main of the Connecticut Insurance Department for a fraud investigation, since he had information the school's insurer had paid \$497,875 on property insurance claims. Mr. Main said he had no information about this claim. Halbig has been unable to obtain the school district's property insurance policies, broker's name, or claims made despite several FOI requests to Newtown Public Schools, CIRMA, and the Connecticut Department of Education (Exhibits 20 and 45-D).

The nonproduction of records requested from an official who has a statutory duty under FOIA to furnish them is admissible evidence to prove the event in question did not take place. The foregoing establishes that no claim for property damage or workers' compensation was made to the school district's insurer.

c. Expert forensic opinion that Avielle Richman is Lenie Urbina.

The person claimed to be Avielle Richman, the murdered daughter of Jeremy Richman and Jennifer Hensel, is, in fact, the living girl Lenie Urbina. That is the opinion of a forensic investigator Halbig hired to compare photographs. The report and biographical details of this investigator, James K. Appleton, are Exhibit 21.

d. Two conflicting photos of the lined-up children.

The “conga line photo” is the only published photograph of children evacuating from the school. An investigator calling himself “QKULTRA” discovered that a slideshow of this and other photos, among a group of 20 supposedly taken by *Newtown Bee* photographer Shannon Hicks, was uploaded to YouTube *on Dec. 13, 2012*.¹⁷ His examination of this metadata proceeds step-by-step so is readable by sight and reflects the data accurately. It is admissible under Code Sec. 10-1.

e. Multiple “in memoriam” websites created, and staged photos uploaded, before Dec. 14, 2012.

Exhibit 22-A is a document created by Halbig presenting other researchers’ findings, supported by screenshots. It shows that the United Way condolence page for Sandy Hook was published Dec. 11, 2012, not only in Western Connecticut, but in Norman, Oklahoma; that the National Ass’n of Women Law Enforcement’s website contained a statement by the Baltimore County Police Chief made Dec. 12, 2012, about gun violence and a “situation report” in connection with the Sandy Hook shooting; that the funding site “Youcaring” promoted a “Fundraiser for the Families Involved in the Tragic Newtown, CT Shootings” on Dec. 12, 2012; that a GoFundMe page seeking donations for victims of the shooting was published in Spanish on Dec. 10, 2012; that the Arlington Red Devils published “Talking with your Child about the Sandy Hook Tragedy” on Dec. 10, 2012; and that the FBI report stated the shooting happened Dec. 13, 2012, based on a Department of Defense report published that same day. These

¹⁷YouTube summarily removed QKULTRA’s channel, along with videos possibly numbering in the hundreds made by other Sandy Hook researchers. QKULTRA established mirror sites, however, one of which is: <https://www.youtube.com/watch?v=-uCOd7r4cfA>. The investigation he did on the OffLiberty website today brings up only an error message.

documents are not hearsay, since they are offered to prove that the publication of statements about a shooting at Sandy Hook occurred earlier than Dec. 14, 2012. The summaries are available for examination by any person at the links provided in the exhibit, and admissible pursuant to Code Rule 10-5.

Exhibit 22-A has a photograph, on p. 10, believed unpublished, of three adults grinning, one of whom holds a child, who have appeared in a very different *published* photo (Exhibit 22-B) where the adults are *not* grinning; the man in the ball cap has his back turned and is mostly out of the picture; and the child is crying. The woman wears the name tag Alicia Hannan, and she works for the FBI. The photo in Exhibit 22-A bears a creation date of *Dec. 13, 2012*. This is followed by documentation that photos were provided on *Nov. 23, 2012*, to the Associated Press from Eastern Connecticut State University of ECSU's alumna Victoria Soto, who graduated in 2008, to support naming a school after her. The occasion was "School Shooting – Soto" in Newtown, Connecticut. The "shooting" of Ms. Soto, of course, did not happen until Dec. 14, 2012.

Approximately 18 months into his investigation, Halbig spoke with the Associated Press photographers whose pictures had appeared, with their credits, as purported documentation of the massacre, and he verified their upload dates as Dec. 12th and 13th, 2012. One AP photographer, who lives in Newtown, was named Michael Duffy. Mr. Duffy showed up and started taking pictures, and was run off the premises. Video from news helicopter shows police confronting him and ordering him to leave.¹⁸ He told Halbig, "I'm not allowed to talk about it."

¹⁸https://www.youtube.com/watch?v=AGTXch9_8I4&fbclid=IwAR3oB1UnY533yCBplCCg9XJMzOdFRlufsxUHRe0GLjyPV2rkWFW29tS8IgY (referenced portion begins at 1:50, with man in blue jacket yelling at man behind the ambulance)

An article appeared in *The Atlantic* the very day of the shooting, presciently titled, “Has there ever been a fatal shooting at a public elementary school?”¹⁹ It discusses Sandy Hook. The author is Emily Chertoff, daughter of Michael Chertoff, former head of the Department of Homeland Security and now owner of the Chertoff Group, which consults on security systems and “includes a client that manufactures [full-body scanners for airports].”²⁰

e. “Everyone Must Check In” log withheld. There was a sign in the background, when neighbor Gene Rosen was interviewed, saying “Everyone Must Check In.” Exhibit 23. That sign indicates the event was a staged production, or drill. At Halbig’s FOI hearing, Newtown First Selectwoman Pat Llodra stated that she believed the sign had been provided by the Department of Homeland Security. Exhibit 24 (excerpt from transcript of FOIA hearing, June 3, 2015, p. 133, line 17).

Halbig has repeatedly tried to obtain the log of people checking in and been denied it. His FOI requests to Connecticut State Police on June 20, 2015 and again on Dec. 8, 2017 (Exhibits 42-A and -B) were never responded to (and NPD Chief Kehoe had testified under oath at the FOI hearing that CSP took possession of all evidence). Other indications the televised events represented as occurring Dec. 14, 2012, were planned and staged as a drill are the portable toilets on site; bottled water; lanyards around the necks of several participants; and police officers munching on snacks²¹ and having pizzas delivered, this while the nurse and secretary were still unaccounted for and there were supposed to be dead bodies lying inside the school (Exhibit 52).

¹⁹ <https://www.theatlantic.com/national/archive/2012/12/has-there-ever-been-a-fatal-shooting-at-a-public-elementary-school/266286/>

²⁰ <https://washingtonmonthly.com/2010/01/01/page-7-vs-page-15/>

²¹ https://www.youtube.com/watch?v=z3DO_674-Qo&t=7997s (beginning at 1:31:54)

f. Police dispatch tapes tampered with and police reports and school records withheld.

Exhibit 25 contains Halbig's attorney Kay Wilson's appeal (docketed Jan. 21, 2016) of the denial of his FOI request to Newtown Police Chief Michael Kehoe for an audio copy of .Newtown Police dispatch communications to and from all units on both Dec. 13 and Dec. 14, 2012. Mr. Kehoe had refused to provide those documents as "too onerous." A disc was later produced, and Halbig withdrew the request, but on March 18, 2016, moved to reopen the hearing, because the recording was broken up, missing segments, and generally non-responsive to the FOI request. Exhibits 26-A and -B. That motion was denied.

Ms. Wilson filed another appeal with the FOI Commission after Halbig's requests of the Newtown Police Department on Feb. 21, 2016, for "the complete officers' narrative/incident report when responding to the Sandy Hook Elementary School Shooting on Dec. 14, 2012," were denied. The Town's attorney, Monte Frank, told her the Newtown Police Department did not have such documents. Exhibit 27. The police chief, Kehoe, had earlier testified that any statements taken by the CSP from Newtown police officers were in the possession of the CSP, while the CSP's representative, Christine Plourde, told Halbig he must obtain the Newtown PD reports "from the originating agency."

A number of NPD officers' "statements" are referred to in the CSP report, but not included. In addition to being severely redacted, they appear to be interviews, not statements. Exhibit 54. At Halbig's FOI hearing on Feb. 18, 2016, the CSP took the position that it could not produce the Newtown police reports on the ground that they were "witness statements," and also withheld the CSP dash cam videos, on the basis that they are evidence, so exempt from FOI requests. This very contention has recently been rejected by the Connecticut Supreme Court in a

case brought by the *Hartford Courant* (HHB-CV15-6029797-S) having to do with evidence in a closed case which was seized from the Lanza home.

The conclusion which must be drawn from this runaround is that the first responding agency, the Newtown Police, made *no reports whatsoever* respecting one of the most deadly mass casualty incidents in history.

Ms. Wilson filed more appeals for Halbig over the denial of his FOI requests to inspect records pertaining to the trip which members of the Sandy Hook Elementary School choir took to sing at the Super Bowl football game in February 2013. Those students were never identified. Halbig requested parental permission forms, NFL release forms, flight manifests, and hotel bills for the four days they were in New Orleans. The trip had been approved in an executive session of the Newtown Public Schools board and an administrator “on loan” from Monroe Public Schools accompanied them. Newtown schools’ attorney Monte Frank once again said there were no responsive documents. Frank then moved the FOI Commission *to decline to schedule hearings* on these appeals *and the Commission granted his request*. Exhibit 28-A contains a sample of this documentation. Exhibit 28-B consists of other FOI requests Halbig made to the Town of Monroe and NPS for Super Bowl trip records and other matters. He was never provided any documents relating to the Super Bowl.

On 14 Nov. 2013, Halbig asked Newtown Public Schools to provide him copies of the contracts and costs for the crime scene clean-up, including the removal of material such as brain matter and body fluids, which are biohazards. No documents were ever produced. Exhibit 29.

- g. *The Crowne Plaza Hotel in Southbury hosted a crush of press and federal officials for at least three days before Dec. 14, 2012.*

The sales manager at the Crowne Plaza Hotel in nearby Southbury, Connecticut, one Kate Trudeau, telephone: (203) 586-1524, told Halbig that on Dec. 12th and 13th she was on the phone all day long reserving rooms and meeting spaces and responding to the needs of government officials and national news media, such as ABC and NBC, who arrived before December 14, 2012. This means the event was staged. The hotel was transferred to new ownership about six months later and its name changed to Wyndham. Ms. Trudeau was still employed there in August 2018.

- h. *On Dec. 12, 2012, national news treated the Sandy Hook event as a production, naming actors, director, script, camera operators, etc.*

An ABC “World News Tonight” movie which covered the Sandy Hook shooting was produced Dec. 12, 2012, according to ABC’s own promotional material. Exhibit 30 lists the cast and crew, but the documentary itself has been removed from the web. The Internet Movie Database (IMDB) used to also reflect that the Sandy Hook production was a movie made on Dec. 12, 2012, but the page has been altered.²²

- i. *Payouts and conflicts associated with the Connecticut state lottery.* Other researchers have found that people connected with the Sandy Hook event have won the Connecticut state lottery multiple times. Stephen Zvon, a member of the Newtown Economic Commission, was listed as a lottery winner 11 times, “victim” father Mark Mattioli four times (winning over \$100,000 in different games), and “victim” mother Michele Gay once (winning

²²Wolfgang Halbig’s name was inserted as one of the producers, as an apparent practical joke.

FEMA's response follows: it said no responsive records existed.

3) Exhibit 33 contains Halbig's Dec. 2, 2015, FOI request to the Connecticut State Police (Dept. of Emergency Services and Public Protection) complaining he had not been provided materials which were referred to, but not included, in the CSP report, including a supplemental report of Captain Jose Rios and the entire investigative reports of Lt. Sinko and Lt. Robinson, the latter being a commanding officer of the Newtown Police Department. Halbig also asks for a certified copy of the flight log for Sgt. McLain, who was the pilot of Trooper 1, and McLain's work attendance records and military orders for the period April 20 – June 11, 2015, since he was represented as unavailable ("in training") during Halbig's FOI hearing. Halbig got no response to this request. This exhibit further establishes that Halbig was given a runaround, CSP telling him the materials were in the possession of NPD, and NPD telling him he had to get them from CSP.

4) Exhibit 34-A is Halbig's request of Dec. 22, 2015 (made a second time on Aug. 24, 2018, and a third time on Sept. 8, 2018) to Rob Sibley, Deputy Director of Planning and Land Use with the Town of Newtown, for the Town's FEMA applications for storm reimbursement from 2010 through 2015, FEMA's authorization of the expenditures, and copies of the checks received. Exhibit 34-B is a request for the same types of materials from the Newtown First Selectman Pat Llodra, on Apr. 8, 2017. Halbig has never received a response to either request.²⁴

²⁴ It bears mention that Robert Sibley—not the director of his department, but only a deputy--was a guest at an event in January 2013 featuring Senator Richard Blumenthal (the father of Plaintiffs' attorney Matthew Blumenthal), Arizona Congresswoman Gabby Giffords, and the lieutenant governor, as well as that his wife, Barbara Sibley, posed as a witness during the Sandy Hook event, reporting she was at the front door of the school while the shooting was in progress. Both were interviewed by Katie

\$30,000) on the Connecticut Lottery's website, which has now been altered so such searches cannot be done. The site in note 19 contains screenshots of the results noted above.²³

j. Additional FOI nonresponses. Halbig made the following additional Freedom of Information Act requests, with the lack of responses (or insufficient responses) as noted:

1) Exhibit 31-A is correspondence related to Request #2015-FEFO-00235 to the Federal Emergency Management Agency (FEMA), asking for log sheets and after-action reports related to the Sandy Hook event, along with copies of FEMA reimbursements to Newtown Public Schools for damages caused when Sandy Hook school was flooded in 2009, 2010, and 2011. (Halbig made the request for flooding damages more specific in Exhibit 32.) He received no documents in response to the request for payouts due to the Sandy Hook event.

Exhibit 31-B is request no. 2015-FEFO-00262, also to FEMA, asking for copies of the FEMA Severe Weather declared emergency reimbursement to Newtown Public Schools for flooding and other damages to Sandy Hook School, including documents submitted by NPS and the City of Newtown for such reimbursements. Halbig did receive one document in response, establishing that the Town of Newtown received four payments totaling \$282,171.60 between Dec. 13, 2011, and March 2, 2012, for debris removal, grinder pumps, and road damage repair. (These payments support a conclusion that SHES was rendered unusable by such floods. SHES was also contaminated with asbestos, *see* Exhibit 47.)

2) Exhibit 32 is Halbig's FOIA request to FEMA for its evaluations pursuant to its National Incident Management System (NIMS), including of its ICS Command Center at Sandy Hook, noting that over eight FEMA evaluators were present at Sandy Hook on Dec. 14, 2012.

²³ <http://www.thesleuthjournal.com/sandy-hook-ministry-plenty/>

5) Exhibit 35-A is Halbig's FOI request for copies of the news helicopter videos the CSP had to have seized on Dec. 14, 2012, which filmed seven police officers chasing a suspect through the woods. Halbig has never received such videos. This chase was a ploy. Halbig found one news video which bears the time stamp of 12:23 p.m. on 12/14/12 (substantiated by Gov. Malloy's press conference directly afterwards at 12:26 p.m.) However, dispatch said a teacher had reported "two shadows running behind the gym" at 9:39:18. So the chase in the woods took place almost three hours later. When the chase starts, officers are running in front of an open storage shed, a location which should have been cleared three hours earlier.

Halbig has examined the CSP report looking for the names and DOB's, and results of NCIC background checks for existing warrants, of two suspects who were seen pruned out, the second one after the chase in the woods at 12:23 p.m. A cop can be heard on the news video saying, "He's coming at me!" and there is a dog barking. Both suspects were escorted away by Capt. Rios in handcuffs. There is not one word in the CSP report about these arrests, in violation of standard police practice.

Halbig also made a FOI request to Chief Viadero (Exhibit 35-B) for the news helicopter videos, narrative police reports about the chase of that man through the woods, and the NCIC report. He also asked for all the photographs *Newtown Bee* reporter Shannon Hicks took, showing the true date and time she took them, since she must have sneaked onto a crime scene to do so. These materials are evidence which should be in the NPD and CSP's possession. Halbig again received no response. A paralegal named Mary Lou Kramer with the Connecticut

Department of Energy and Environmental Protection (Exhibit 50) told him, in response to a telephone request, that all DEEP's records about the chase were turned over to CSP (and that audio recordings would not be produced). But again, as noted, there is nothing about this incident in the 7,000 page CSP report. Exhibit 35-C is another FOIA request asking for incident reports and K-9 unit incident reports, respecting the chase through the woods, as well as audio transmissions and a copy of Capt. Raul Comego's personnel file. It is followed by Kay Wilson's request for another FOI hearing, since DEEP did not respond. The request was denied.

6) Exhibit 36 is Monte Frank's response dated 3.3.16 to Halbig's FOI request 35-B for NPD and NCIC reports, copies of news helicopter videos and Shannon Hicks's pictures. He denies that NPD has any of these materials save narrative police reports about the chase through the woods (item #2), but such reports were then never produced.

7) Exhibit 37 is Halbig's FOI request originally made April 10, 2016 (and again on Sept. 7, 2018) to Newtown Police Chief James Viadero for the audio recordings of the four 911 landline calls which Maureen Will, director of Emergency Communications for Newtown, said at a 911 conference came in between 9:00 a.m. and 11:00 p.m. [sic] to the Newtown Police call center on 12/14/12. The first call was from Barbara Halstead, which is publicly available. Halbig never got the other three. He also asked for the "Call for Service" report which former Chief Kehoe stated at the FOIA hearing was the call center's official report, and for the incident log for these four 911 calls. Chief Viadero said he would consult with the town attorney. No response was ever made to Halbig.

8) Exhibit 38 is Halbig's FOI request to a number of Connecticut legal and public safety officials made Feb. 20, 2016, with a follow-up on April 27, 2016, asking for the dash cam

videos of 32 different Connecticut State Police officers for Dec. 13 and 14, 2012, whom he identified specifically by name and badge number. He also reiterated prior requests for the Trooper 1 (CSP helicopter) communication on Dec. 14, 2012. He has never received the materials requested. He did receive a putative flight log, Exhibit 18, which says the mission for CSP was “to assist Newtown PD w/ the search for a suspect” in the woods. But Halbig has not been provided the audio or a transcript of the communication for Trooper 1 that day, despite making repeated requests for that.

9) Exhibit 39 is Halbig’s FOI request of June 24, 2016, asking again for the dash cam videos of 39 [sic; actually 32] CSP troopers, whom he had identified by name and badge number in his previous request; the reports of 200-plus “calls for service” that Maureen Will said CSP (and not her call center in Newtown) received on 12/14/12 between 9:00 and 11:00 a.m. regarding the Sandy Hook School shooting; and the incident log for each of these 200 calls. No response was received.

10) Exhibit 40 is Halbig’s FOI request of Oct. 5, 2016, to officials Plourde and Webster for the radio communications from CT State Trooper 1 helicopter, which should have been recorded by dispatch, as well as copies of four officers’ dash cams, from 12/14/12. No response.

11) Exhibit 41-A is Halbig’s FOI request of May 17, 2017, for work orders from any school district or government employee to paint the bus drop-off and pick-up area at Sandy Hook School with yellow stripes and install signage reading “No Parking – Fire Lane.” The photo accompanying that email should be compared with Exhibits 41-B and 41-C, photos from a time when there was no such yellow striping next to the school. It is unknown when or why

this yellow “no parking” striping was put next to the school, since buses would naturally pick up students there; however, planners of a staged event would not want vehicles parked there. Halbig never received a response to this request. Exhibit 55 shows the striping in existence as of March 29, 2012.

12) Exhibit 41-A, second page, starts a new email from Halbig to James Viadero and Monte Frank from May 4, 2017, asking for all 911 calls received by Newtown Dispatch on Dec. 14, 2012, the complete official “Call for Service” report. He was provided one such report, the so-called (unsigned) 74-page “After Action Report,” and points out that the tag number of “Adam Lanza’s car”—a black Honda supposedly parked at the school--appears on that Call for Service detail, at 9:35 a.m. on 12/14/12, although the first call from a police officer did not come in until 9:42 a.m. This “Call for Service” report thus has also been fabricated, since dispatch had no way of knowing this tag number.

Another problem with the “Call for Service” report is that the call was for “Unwanted Person” and says “Priority: Medium.” It should have said “Shots Fired” and been marked “High Priority,” since the first caller, Barbara Halstead, *said* shots had been fired! So this document, too, is fake.

13) Exhibit 42 contains FOI requests for the check-in log created by virtue of the “Everyone Must Check In” sign. No response was made, other than the State’s pointing anyone trying to discover information such as this to the 7,000-page, nine-volume CSP report, which lacks both a Table of Contents and an index, and is so severely redacted as to constitute nonsense. It was described by the FOIA commission chairman as “the biggest data dump we’ve

ever received.” Halbig has reviewed that CSP report in its entirety nonetheless. There is no check-in log in it.

14) Exhibit 43-A is Halbig’s FOI request of Sept. 4, 2018, to the current principal and custodian of Newtown High School (Longobucco and Gombos) for invoices and billing records from Sysco Foods, along with all phone calls made from Ms. Kulikowski’s phone and her personnel file (see above, at p. 7). Exhibit 43-B is a similar request relating to Dean Foods. Longobucco and Gombos have never responded.

15) Exhibit 44 is Halbig’s Jan. 16, 2018, FOI request of Christine Plourde for information relating to activation of the Emergency Service Unit Personnel, via a CSP helicopter stationed in Hartford; once again, a copy of the CSP Helicopter 1 radio transmission and official transcript provided to the Connecticut Major Crime Investigative team for 12/14/12, including radio updates; once again the “Everyone Must Check In” log, which former Chief Kehoe testified was in possession of CSP; and P-card usage (a government version of a credit card) for essential supplies; and dash cam pictures. He has received no response.

16) Exhibit 45-A is Halbig’s FOI request of Kathy June of Newtown Public Schools, originally made March 10, 2016, and repeated on Sept. 7, 2018, for the contracts between the Town of Monroe and Newtown School Board for use of Chalk Hill Middle School, including insurance agreements, fire safety inspections, code compliance updates, certificate of occupancy, electric bills, water and trash pick-up bills, safety inspection reports, and more, for Chalk Hill. Exhibit 45-B is Halbig’s FOI request of June 16, 2018, repeated Sept. 7, 2018, of Kathy June for all purchase orders approved by Dawn Hochsprung or requested by Maryrose Kristopik from July 1, 2012, through June 30, 2013. He has made similar requests to the Town

of Monroe, which include documents relating to the food deliveries and 471 applications.

Exhibit 45-C. Exhibit 45-D is another request of Ms. June for information about Newtown Public Schools' property insurance, claims, etc. He has received no response to any of these.

17) Exhibit 46-A is Halbig's FOI request to CSP of March 16, 2017, forwarding earlier requests from May 13 and July 16, 2015, and March 24, 2014, which he repeated on Sept. 7, 2018 (and made of DHS), for the radio communications with, and flight log and mission description for, the helicopter "Trooper 1" on Dec. 14, 2012, as well as a Cessna fixed-wing aircraft that CSP put in the air, which he learned about from FAA. He did get a flight log and mission description, Exhibit 18. He had spoken, in January 2016, to the pilot of Trooper 1 on Dec. 14, 2012, Sgt. James McLain, who, along with a Trooper Hernandez, confirmed that all radio communications are recorded and that Halbig is entitled to the tapes. No response was received to Halbig's request, which he has made multiple times. These records were created but have been illegally withheld. He has also asked for the Standard Operating Procedures for Trooper 1 (the Aviation Unit), and never received them. Exhibit 46-B.

18) Exhibit 47 is part of the State of Connecticut's report establishing that the Sandy Hook School was contaminated with asbestos, another reason for staging an event: to obtain financing for demolition. The abatement cost paid upon demolition in 2013 was \$340,000.

19) Exhibit 49 is Halbig's FOI to the present Newtown police chief, James Viadero, asking for documentation of the \$664,785 the Newtown Police reportedly were granted by DOJ for overtime worked on Dec. 14, 2012. He has, again, received no response.

k. Miscellaneous reports supporting the thesis that the Sandy Hook shooting was staged, and no one died.

1) CNN showed armed police officers running around a school on Dec. 14, 2012—but it was St. Rose of Lima School, which was in lockdown that day, *not* Sandy Hook School.

2) The Sandy Hook Volunteer Fire and Rescue Service's website does not show any calls coming in on Dec. 14, 2012.²⁵

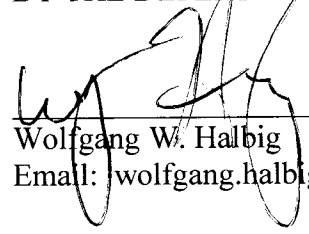
3) Newtown Public Schools announced, in around October 2011, that beginning in Fall 2012 the contracts for school bus services would be taken from numerous owner-operators and given to one company, All-Star Transportation. The last day for the independents was June 30, 2012. Two of the O/O's interviewed, Marsha Moskowitz and Phil Carroll, said they regarded it as a "complete betrayal and conspiracy at the highest levels."²⁶

4) Halbig called Life Star in Hartford, CT (emergency services) and asked why they had not sent trauma helicopters to Sandy Hook Elementary. The manager's response was, "I'm just as surprised as you are. We were never contacted."

5) No videos or photos have been released of victims or perpetrator within the school—yet there was a security system there.

Dated this 20 day of December, 2018.

BY THE DEFENDANT PRO SE:



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²⁵ <http://sandyhookfire.com/history.html?stx=150&sort=&order=&search=>

²⁶ <https://patch.com/connecticut/newtown/meet-marsha-moskowitz-and-phil-carroll> [.] See also: <https://www.newtownbee.com/owner-operators-last-day-a-fond-farewell-to-newtowns-bus-drivers>

